

REMARKS

Applicant wishes to thank the Examiner for reviewing the present application and for taking the time to discuss the present application via telephone earlier today. Applicant acknowledges that claims 1-11 have been allowed.

Claim Amendments

Claim 12 has been amended replacing "access to" with "operation of" on line 7, and replacing "using said secret key" on line 7 with "to permit use of said secret key". These amendments have been made to clarify that operation of (e.g. access to) the personalized device to use the stored key is controlled based on the favorable comparison of the two outputs. Support for these amendments can be found on page 7, line 28 through page 8, line 16.

No new subject matter is believed to have been added by way of these amendments.

Claim Rejection

Claim 12 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Samar (5,778,072) in view of Sehr (6,085,976). Applicant respectfully traverses the rejections as follows.

Claim 12 as amended requires: "controlling operation of said personalized device to permit use of said secret key based on a favorable comparison of a first output displayed under control of said secure module and a second output displayed under control of a main processor"

The Examiner indicates on page 3 of the office action that Samar does not teach a comparison step that includes display of a first output and display of a second output. Therefore, to establish a *prima facie* case of obviousness, Sehr must at least teach this feature, i.e. what is missing from Samar since the combination of references must teach every element of the claim.

The Examiner points to column 38, lines 30-50 of Sehr as teaching what is missing from Samar. In this passage, Sehr teaches retrieving data from a card and displaying the data for a traffic officer as well as uploading the data for comparison with a remote database. However, this does not teach a favorable comparison of two outputs as recited in claim 12, since the officer is only provided with a single display, be it on a card reader or laptop. Although the data may also be sent for verification with information in a database, there is no teaching that this data is

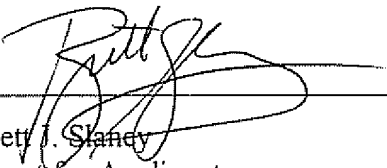
actually displayed. A comparison of data in a database can be done internally without any display and Sehr is silent as to a second display. Sehr teaches a single output related to a picture ID and possible further verifications of data, which does not require a separate display. Claim 12 requires a first display controlled by the secure module and a second display controlled by the device, and the secure module is removably coupled to the personalized device. Therefore, the displays are viewable together for the comparison step. In Sehr, even if there was a display at the remote database (which is not disclosed by Sehr), at most there would be two displays that cannot be compared together by the same user since the one display would be at a remote location. Therefore, Applicant believes that Sehr does not teach providing first and second outputs as recited in claim 12 and, as such does not teach what is missing from Samar.

Accordingly, Applicant believes that claim 12 clearly and patentably distinguishes over Samar in view of Sehr for at least these reasons and is in condition for allowance.

Applicant requests early reconsideration and allowance of the present application.

Due to the finality of the rejection, Applicant invites the Examiner to contact the undersigned should there be any other issues affecting the allowance of the present application.

Respectfully submitted,



Brett J. Slaney
Agent for Applicant
Registration No. 58,772

Date: November 22, 2006

BLAKE, CASSELS & GRAYDON LLP
Suite 2800, P.O. Box 25
199 Bay Street, Commerce Court West
Toronto, Ontario M5L 1A9
CANADA

Tel: 416-863-2518
BSL/